

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W. R. GRACE & CO., et al.,¹) Case No. 01-01139 (JKF)
) (Jointly Administered)
Debtors.)
Related Docket Nos. 9311 and 9501

**CERTIFICATION OF COUNSEL REGARDING PROPOSED
CASE MANAGEMENT ORDER FOR THE ADJUDICATION OF THE
DEBTORS' THIRTEENTH OMNIBUS OBJECTION TO 2,937 UNAUTHORIZED
CLAIMS FILED BY THE LAW FIRM SPEIGHTS & RUNYAN (SUBSTANTIVE)**

The undersigned hereby certifies that:

1. Pursuant to the *Order Granting Certain Relief and Directing Certain*

Discovery with Respect to Speights & Runyan [Docket No. 9501] the Debtors and Speights

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

& Runyan (the "Parties") have been directed to file a proposed joint case management order ("CMO") outlining the disposition of the *Debtors' Thirteenth Omnibus Objection to 2,937 Unauthorized Claims Filed By the Law Firm Speights & Runyan* [Docket No. 9311]. In the event the Parties are unable to agree on a joint CMO, each Party shall file a separate proposed CMO.

2. The Debtors conferred with Speights & Runyan and could not reach agreement on the terms of a proposed CMO and, accordingly, submit the attached *Case Management Order for the Adjudication of the Debtors' Thirteenth Omnibus Objection to 2,937 Unauthorized Claims Filed By The Law Firm Speights & Runyan (Substantive)* (the "Debtors' CMO").

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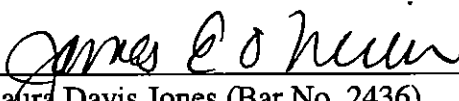
3. Accordingly the Debtors respectfully request that the Court approve the Debtors' CMO attached hereto as Exhibit A.

Dated: September 23, 2005

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